

COHEN, LEDER, MONTALBANO & CONNAUGHTON, LLC
669 River Drive, Suite 125
Elmwood Park, New Jersey 07407
(908) 298-8800
Attorneys for Defendant ATU Local 880

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY – NEWARK VICINAGE

SINOWA JOHNSON,

Plaintiff,

v.

NJ TRANSIT BUS OPERATIONS, INC.
d/b/a NJ TRANSIT and ATU LOCAL 880,

Defendants.

Case No.: 1:25-cv-02528

NOTICE OF MOTION

To: Hon. Karen M. Williams, U.S.D.J.
United States District Court
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets, Courtroom 4A
Camden, NJ 08101

Emanuel Kataev, Esq.
Sage Law LLC
12811 Jamaica Avenue
Jamaica, New York 11423
Attorney for Plaintiff, Sinowa Johnson

Travis M. Anderson, Esq.
Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP
50 Tice Boulevard, Suite 250
Woodcliff Lake, New Jersey 07677
Attorney for Defendant, NJ Transit Bus Operations Inc.

PLEASE TAKE NOTICE that on September 15, 2025, at 9 a.m. in the forenoon or as soon thereafter as counsel may be heard, Defendant, Local 880 ATU, shall move before the Honorable Karen

M. Williams, United States District Judge, in the Mitchell H. Cohen U.S. Courthouse, Camden, New Jersey, for an Order dismissing Plaintiff, Sinowa Johnson's Complaint, with prejudice, for the Lack of Subject Matter Jurisdiction, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, and for further relief as the Court may deem proper in this matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the Local 880 ATU relies on the attached Declaration of Counsel Montalbano and Memorandum of Law and joins in and adopts the Declaration of Counsel Anderson and Memorandum of Law filed by co-Defendant NJ Transit Bus Operations, Inc., herewith in support of this motion.

PLEASE TAKE FURTHER NOTICE that Defendant Local 880 ATU respectfully requests that the Court rule upon the moving papers submitted, without requiring the appearance of counsel, pursuant to Rule 78 of the Federal Rules of Civil Procedure, unless opposition is submitted, in which case oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed Order accompanies this Motion.

By: 
PAUL A. MONTALBANO
Attorney for Defendant Local 880 ATU

Dated:

